

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor Toni Hardesty, Director

July 21, 2005

Certified Mail No. 7000 1670 0013 8128 5900

Greg Cooperrider Complex Manager Potlatch Corporation 2200 Railroad Ave. St. Maries, ID 83861

RE:

Facility ID No. 009-00030, Potlatch Corporation, St. Maries Final Tier II Operating Permit and Permit to Construct

Dear Mr. Cooperrider:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. T2-040124 for Potlatch Corporation in St. Maries, in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively. This permit replaces Permit to Construct No. 009-00001, issued July 21, 1999, and Tier II Operating Permit and Permit to Construct No. T2-020121, issued May 12, 2004, the terms and conditions of which shall no longer apply.

The enclosed permit is effective immediately and is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the Rules for the Control of Air Pollution in Idaho.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (Rules of Administrative Procedure Before the Board of Environmental Quality). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, DEQ encourages you to contact Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely.

Martin Bauer, Administrator

Air Quality Division

MB/BR/CZ/sd Permit No. T2-040124

likors for:

Enclosure



Air Quality

TIER II OPERATING PERMIT PERMIT TO CONSTRUCT

State of Idaho **Department of Environmental Quality**

PERMIT No.: T2-040124

FACILITY ID No.: 009-00030

AQCR: 62

CLASS: A

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 533.9, 5240.9

1. PERMITTEE

Potlatch Corp. - Lumber Drying Division, St. Maries Complex

2. PROJECT

Tier II Operating Permit and Permit to Construct Revision

3. MAILING ADDRESS	CITY	STATE	ZIP	
2200 Railroad Ave.	St. Maries	ID	83861	
4. FACILITY CONTACT	TITLE	TELEPHONE		
Bernie Wilmarth	Environmental Manager	(208) 245-2585		
5. RESPONSIBLE OFFICIAL	BLE OFFICIAL TITLE TELEPHONE		E	
Greg Cooperrider	Plant Manager (208) 245-2585			
6. EXACT PLANT LOCATION		COUNTY		
Milltown Road, St. Maries, Idaho		Benewah		

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Lumber drying

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 21, 2005

DATE EXPIRES May 12, 2009

Table of Contents

1.	PERMIT SCOPE	4
	FACILITY-WIDE CONDITIONS	
	HURST BOILER	
	LUMBER-DRYING KILNS	
	OIL AND EDGE-SEAL PROCESS	
	APPENDIX	
	PERMIT GENERAL PROVISIONS	
1.	FERMIT GENERAL PROVISIONS	, I /

Acronyms, Units, and Chemical Nomenclature

AQCR air quality control region

CFR Code of Federal Regulations

CO carbon monoxide

DEQ Department of Environmental Quality

dscf dry standard cubic feet

EPA U.S. Environmental Protection Agency

ESP Electrostatic Precipitator

grain (1 lb = 7,000 grains)

IDAPA A numbering designation for all administrative rules in Idaho promulgated in

accordance with the Idaho Administrative Procedures Act

km kilometer

lb/hr pound per hour NO_x nitrogen oxides

NSPS New Source Performance Standards

O & M Operations and Maintenance

PM particulate matter

PM₁₀ particulate matter with an aerodynamic diameter less than or equal to a nominal ten

micrometers

SO₂ sulfur dioxide

T/R transformer-rectifier

T/yr tons per year

UTM Universal Transverse Mercator

VOC volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124						
Permittee:	Permittee: Potlatch Corporation Date Issued: July 21, 2005					
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009		

1. PERMIT SCOPE

Purpose

- 1.1 The purpose of this permit is to establish state and federally enforceable requirements necessary to ensure compliance with all applicable standards, including ambient air quality standards for criteria pollutants.
- 1.2 This Tier II operating permit and permit to construct revises and replaces Tier II Operating Permit and Permit to Construct No. T2-020121, issued May 12, 2004, the terms and conditions of which shall no longer apply.

Regulated Sources

1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1 SOURCES OF EMISSIONS

Permit Section	Source Description	Emissions Control(s)	
3.0	Hurst wood-waste boiler, HYB-6500-150, 34,500 lb/hr steam	Multiclone and McGill Air Clean Intercept Model 2-75 electrostatic precipitator	
4.0	Four Coe/Moore double-track, steam-heated, lumber-drying kilns	None	
5.0	Oil and edge-seal process	None	

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124						
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030				
Location:	St. Maries, Idaho	FACILI1 I ID No. 009-00030	Date Expires:	May 12, 2009		

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.14
2.5	Odors	Reasonable control	IDAPA 58.01.01.775-776	2.6, 2.14
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.14
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9, 2.10, 2.14
2.11	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.14
2.13	Fuel-burning Equipment	Grain-loading standard	IDAPA 58.01.01.676-677	2.14

Facility Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive dust, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive dust are effective. If fugitive dust is not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive dust was present (if observed), any corrective action taken in response to the fugitive dust, and the date the corrective action was taken.

Odors

2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124						
Permittee:	Permittee: Potlatch Corporation					
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009		

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. If the monthly see/no see observations indicate that no visible emissions are observed for four consecutive months or if Method 9 observations indicate that the opacity is below 20% for four consecutive months, or any combination of see/no see or Method 9 observations indicate no visible emissions or opacity exceedances, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observations indicate opacity greater than 20%, the observation frequency reverts to monthly. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions.

Reports and Certifications

Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124					
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005	
Location:	St. Maries, Idaho	FACILITY ID 140. 009-00030	Date Expires:	May 12, 2009	

Air Quality Permit Compliance Department of Environmental Quality Coeur d'Alene Regional Office 2110 Ironwood Parkway Coeur d'Alene, ID 83814

Open Burning

2.11 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

Test Methods

For any performance test required in this permit, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 TEST METHODS

	I able 2	2 lest Methods
Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a. EPA Method 202	
PM	EPA Method 5	
NO _X	EPA Method 7	
SO ₂	EPA Method 6	
со	EPA Method 10	
VOC	EPA Method 25 or 25a	VOCs are to be measured and expressed as carbon
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

^{*} Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

Fuel-burning Equipment

2.13 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124						
Permittee:	Potlatch Corporation	Date Issued: July 21, 2005				
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009		

Monitoring and Recordkeeping

2.14 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124						
Permittee:	Potlatch Corporation	Date Issued: July 21, 2005				
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009		

3. HURST BOILER

3.1 Process Description

The primary purpose of the Hurst boiler is to produce and supply process steam that is used as the heat source in the facility's four lumber-drying kilns.

3.2 Control Description

The PM, PM₁₀, and opacity emissions from the Hurst boiler are controlled by a multiclone and an electrostatic precipitator (ESP).

Operating Requirements

3.3 Control Device Requirements

3.3.1 An ESP and a multiclone shall be used to control PM, PM₁₀, and opacity emissions from the Hurst boiler. The multiclone and ESP shall be maintained in good working order and operated as efficiently as practical in accordance with the Operations and Maintenance (O&M) manual specifications, required by Permit Condition 3.12.

[PTC Condition]

3.3.2 If performance testing done in accordance with Permit Conditions 3.7 and 3.9 verifies compliance with Permit Conditions 2.7 and 2.13 when operating only one of the transformer-rectifier (T/R) sets on the ESP, then the boiler may be operated for a reasonable period of time using only one T/R set should one become nonfunctional. While operating only one of the T/R sets, the steaming rate shall not exceed the average steaming rate as defined in Permit Condition 3.6.1 measured during the performance test used to establish the steaming rate limit for operation using only one T/R set. Repairs to the second T/R set shall be made as expeditiously as possible.

[PTC Condition]

3.4 The permittee shall install, calibrate, maintain, and operate, in accordance with the O&M manual specifications, equipment to continuously measure the secondary voltage and amperage applied by each T/R set to the discharge electrodes while the boiler is operating.

[PTC Condition]

3.5 The power applied by each T/R set to the discharge electrodes shall be maintained within O&M manual specifications. Documentation of O&M manual power input specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

3.6 Throughput Limits

3.6.1 The average steaming rate is defined as the running three-hour average of the steaming rates, as determined from the continuous steaming-rate recorded during the most recent compliance test. The average steaming rate shall not exceed 120% of the average steaming rate attained during the most recent compliance test conducted pursuant to this permit that demonstrates compliance with Permit Conditions 2.7 and 2.13. If the tested emission rate is above 0.066 gr/dscf at 8% oxygen, when combusting wood product, the maximum allowable steaming rate shall be limited to the steaming rate

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124 Permittee: Potlatch Corporation Location: St. Maries, Idaho FACILITY ID No. 009-00030 Date Issued: July 21, 2005 Date Expires: May 12, 2009

calculated using the following equation:

Max. allowable avg. steam rate = $(avg. steam rate during test \times 0.08 gr/dscf at 8\% oxygen)$ (tested grain loading at 8% oxygen)

The permittee may conduct additional compliance tests during the permit term to revise the allowable steaming rate, so long as the compliance tests conform to all requirements of this permit. Except during compliance testing, as provided for in Permit Condition 3.9, whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than 24 hours from the discovery of the exceedance, to bring the steaming rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emissions standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[PTC Condition]

3.6.2 The permittee shall install, operate, calibrate, and maintain a monitor to continuously measure the steam production rate of the Hurst boiler. Steam production rate records shall be maintained in accordance with Permit Condition 2.14. If the continuous steam production rate monitoring system becomes inoperable, a backup monitoring method consisting of manual monitoring and recording shall be implemented within 96 hours of the monitoring system becoming inoperable, and shall be used until the continuous steam production monitoring system is operational.

[PTC Condition]

Compliance Testing Requirements

3.7 The permittee shall conduct a particulate matter compliance test in accordance with Permit Condition 2.12 and General Provision 6. The compliance test shall be conducted within 6 months of issuance of this permit to demonstrate compliance with Permit Conditions 2.7 and 2.13.

[PTC Condition]

- 3.8 If the particulate grain loading measured in the initial compliance test is less than or equal to 75% of the applicable emission standard specified in Permit Condition 2.13, no further testing shall be required during the life of the permit. If the particulate grain loading measured during the initial compliance test is greater than 75% but less than or equal to 90% of the applicable emission standard specified in Permit Condition 2.13, a second test shall be required in the third year of the permit term. If the particulate grain loading measured during the initial compliance test is greater than 90% of the applicable emission standard specified in Permit Condition 2.13, the permittee shall conduct a compliance test annually.
- 3.9 The permittee may conduct additional compliance tests during the permit term at steaming rates in excess of the rate established by Permit Condition 3.6.1 to establish a higher steaming rate, so long as compliance with all applicable terms and conditions of this permit is demonstrated.

- 3.10 The permittee shall collect a fuel sample for a wood waste fuel analysis and monitor and record the following information during each compliance test:
 - Visible emissions, using the methods and procedures contained in IDAPA 58.01.01.625
 - Steam production rate, expressed as pounds of steam per hour (lb/hr)

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124				
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009

• Power input to the ESP (the sum of the secondary voltage times secondary current for both transformer-rectifier (T/R) sets, or $P = V_1I_1 + V_2I_2$)

[PTC Condition]

Monitoring and Recordkeeping Requirements

3.11 Secondary Voltage and Amperage Monitoring Requirements

The average power input (secondary voltage times secondary current for both transformer – rectifier sets, or $P = V_1I_1 + V_2I_2$) is defined as the running three-hour average of the recorded power input levels. When operating, the permittee shall monitor and record the average power input every hour. The voltage and amperage recorded shall be consistent with O&M manual units of measure. A compilation of the most recent five years of voltage and amperage records shall be kept at the facility and shall be made available to DEO representatives upon request.

[PTC Condition]

3.12 Operations and Maintenance Manual Requirements

Operation and Maintenance manuals shall be developed for the boiler, multiclone, and ESP within 60 days of issuance of this permit. The permittee shall have developed an O&M manual for the ESP according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the ESP is maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the equipment; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

[PTC Condition]

3.13 Excursions

The permittee shall record all instances of excursions from the operating and maintenance methods and procedures outlined in the O&M manuals developed in accordance with permit condition 3.12. Excursions shall be recorded as any instance where the permittee fails to follow the methods and procedures detailed in the equipments O&M manual. A compilation of the most recent five years of excursions shall be kept at the facility and shall be made available to DEQ representatives upon request.

[PTC Condition]

Reporting Requirements

3.14 Compliance Test Protocol

The permittee shall submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by Permit Conditions 3.7, 3.8, or 3.9.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124					
Permittee:	Potlatch Corporation	EACH ITY ID No. 000 0000	Date Issued:	July 21, 2005	
Location:	St. Maries, Idaho	FACILITY ID No. 009-00030	Date Expires:	May 12, 2009	

3.15 Compliance Test Report

The permittee shall submit a report of the results of any compliance test required in Permit Conditions 3.7, 3.8, or 3.9, including all required process data, to DEQ within 30 days after the date on which any required compliance test is concluded.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124 Permittee: Potlatch Corporation Location: St. Maries, Idaho FACILITY ID No. 009-00030 Date Issued: July 21, 2005 Date Expires: May 12, 2009

4. LUMBER-DRYING KILNS

4.1 Process Description

The primary purpose of the four Coe/Moore, double-track, steam-heated, lumber-drying kilns is to dry different species and dimensions of lumber. Steam is supplied to the kilns by the Hurst wood-waste-fired boiler.

4.2 <u>Control Description</u>

Emissions from the kilns are uncontrolled.

Emissions Limits

4.3 Process Weight Limitations

No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 9,250 lb/hr,

$$E = 0.045 (PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

Monitoring and Recordkeeping Requirements

4.4 Throughput Monitoring

Each month, the permittee shall monitor and record the throughput of the kilns for that month and for the most recent 12-month period. A compilation of the most recent five years of records shall be kept on site and shall be made available to DEQ representatives upon request.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124 Permittee: Potlatch Corporation Location: St. Maries, Idaho FACILITY ID No. 009-00030 Date Issued: July 21, 2005 Date Expires: May 12, 2009

5. OIL AND EDGE-SEAL PROCESS

5.1 Process Description

The oil and edge-seal process applies coatings to plywood panels. Untreated plywood panels are sprayed with a release agent on the top surface using a low-pressure sprayer nozzle. Excess release agent is collected and recycled in the lower reservoir under a modified glue spreader. Coating is then applied to the panels by the glue spreader rollers. The panels are stacked and an edge-sealing compound is sprayed on the edges of the stacked panels.

5.2 <u>Control Description</u>

Emissions from the oil and edge-seal process are uncontrolled.

Emissions Limits

5.3 <u>Volatile Organic Compound Emission Limits</u>

The VOC emissions from the oil and edge-seal process shall not exceed any corresponding emissions rate limits listed in the appendix.

[PTC Condition]

5.4 <u>Visible Emissions</u>

Visible emissions from any stack, vent or functionally equivalent opening associated with the oil and edge-seal process shall not exceed 20% opacity for more than three minutes in any 60-minute period, in accordance with IDAPA 58.01.01.625.

Operating Requirements

5.5 Throughput Limits

The maximum VOC usage from the oil and edge-seal process shall not exceed 39.9 tons per year (T/yr) per any consecutive 12-month period. The VOC usage shall be calculated on a daily basis using the following equation:

$$VOC = \sum_{i=1}^{n} (X_i \times Y_i)$$

Where: VOC = VOC usage in pounds per day

n = Number of coatings used X_i = Usage of coating I per day

Y_i = Weight percent of VOC contained in coating I

Note: Coating refers to any VOC-containing compound used in the surface coating or edge

sealing of plywood panels.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124					
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005	
Location:	St. Maries, Idaho		Date Expires:	May 12, 2009	

Monitoring and Recordkeeping Requirements

5.6 Throughput Monitoring

The permittee shall monitor and record the following information on a daily basis when operating:

- The bulk density of each coating used in pounds per gallon
- The VOC content of each coating on a weight percent basis
- The daily usage of each coating recorded in gallons per day
- The total VOC usage of all coatings on a daily and on a consecutive 12-month basis. The permittee shall use the formula contained in Permit Condition 5.5 of this permit to calculate the daily VOC usage.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124				
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005
Location:	St. Maries, Idaho		Date Expires:	May 12, 2009

6. APPENDIX

Table 6.1 EMISSION LIMITS

Potlatch Corp., St. Maries Emission Limit ^a – Annual ^b (T/yr)			
Source Description	VOC (T/yr)		
Oil and edge-seal process	39.9		

As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124					
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005	
Location:	St. Maries, Idaho		Date Expires:	May 12, 2009	

7. PERMIT GENERAL PROVISIONS

- 1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
- 2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- 3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms
 and conditions of this permit, to inspect any monitoring methods required in this permit, and
 require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed
 appropriate by the Director.
- 4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction Date
 - Completion/Cessation of Construction Date
 - Actual Production Startup Date
 - Initial Date of Achieving Maximum Production Rate Production Rate and Date
- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040124					
Permittee:	Potlatch Corporation	FACILITY ID No. 009-00030	Date Issued:	July 21, 2005	
Location:	St. Maries, Idaho		Date Expires:	May 12, 2009	

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.